REMARKS

By this amendment, claims 1 and 4 have been amended. Claims 2, 3, 8-12, 14, 15, 23 and 34-41 have been previously cancelled. Accordingly, claims 1, 4-7, 13, 16-22, 24-33 are currently pending in the application, of which claims 1, 13 and 19 are independent claims. Applicants respectfully submit that the above amendments do not add new matter to the application and are fully supported by the specification.

Entry of this Amendment is respectfully requested because it places the present application in condition for allowance, or in the alternative, better form for appeal. In view of the above Amendments and the following Remarks, Applicants respectfully request reconsideration and timely withdrawal of the pending objections and rejections for the reasons discussed below.

Claim Objection

In the Office Action, claim 1 was objected to for informalities. This objection is respectfully traversed because, in this response, claim 1 has been amended to replace "though" with --through--, as suggested by the Examiner. Thus, withdrawal of the objection is respectfully requested.

Rejections Under 35 U.S.C. §103

Claims 1, 4-7, 13, 18-22 and 26-33 stand rejected under 35 U.S.C. §103(a) as being unpatentable over U. S. Patent No. 6,287,899 issued to Park, *et al.* ("Park") in view of U. S. Patent No. 4,181,564 issued to Fogarty, *et al.* ("Fogarty"). Applicants respectfully traverse this rejection for at least the following reasons.

35 U.S.C. §103(c) reads:

"Subject matter developed by another person, which qualifies as prior art under one or more subsections (e), (f) and (g) of section 102 of this title, shall not preclude patentability under this section where the subject matter and the claimed invention were, at the time of the invention was made, owned by the same person or subject to obligation of assignment to the same person."

Both the present application and Park have been assigned to the same assignee, Samsung Electronics Co., Ltd. The primary reference to Park was filed on December 29, 1999, and published on September 11, 2001 for the first time. The priority date of the present application is April 19, 2000. Park may qualify prior art under 35 U.S.C. §102(e) but does not qualify as prior art under 35 U.S.C. §102(a), (b) or (d). Pursuant to 35 U.S.C. §103(c), the subject matter disclosed by Park does not preclude patentability under 35 U.S.C. §103(a).

Accordingly, Applicants respectfully request withdrawal of the 35 U.S.C. §103(a) of claims 1, 4-7, 13, 18-22 and 26-33.

Claims 16, 17, 24 and 25 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Park in view of Fogarty and further in view of U. S. Patent No. 6,399,222 issued to Arai, *et al.* ("Arai"). Applicants respectfully traverse this rejection for at least the following reasons.

As previously mentioned, pursuant to 35 U.S.C. §103(c), the subject matter disclosed by the primary reference to Park does not preclude patentability under 35 U.S.C. §103(a).

Accordingly, Applicants respectfully request withdrawal of the 35 U.S.C. §103(a) rejection of claims 16, 17, 24 and 25.

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Other Matters

In this response, claim 4 has been amended to be dependent from claim 1, instead of cancelled claim 3.

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CONCLUSION

Applicants believe that a full and complete response has been made to the pending Office Action and respectfully submit that all of the stated objections and grounds for rejection have been overcome or rendered moot. Accordingly, Applicants respectfully submit that all pending claims are allowable and that the application is in condition for allowance.

Should the Examiner feel that there are any issues outstanding after consideration of this response, the Examiner is invited to contact the Applicants' undersigned representative at the number below to expedite prosecution.

Prompt and favorable consideration of this Reply is respectfully requested.

Respectfully submitted,

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